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7 *Attorneys for HASElect-Medical Receivables*
8 *Litigation Finance Fund International SP*

9 **UNITED STATES BANKRUPTCY COURT**
10 **DISTRICT OF NEVADA**

11 In re:
12 INFINITY CAPITAL MANAGEMENT, INC.
13 Debtor.

14 HASELECT-MEDICAL RECEIVABLES
15 LITIGATION FINANCE FUND
INTERNATIONAL SP,

16 Plaintiff,

17 v.

18 TECUMSEH-INFINITY MEDICAL
19 RECEIVABLES FUND, LP,

20 Defendant.

21 TECUMSEH-INFINITY MEDICAL
22 RECEIVABLES FUND, LP,

23 Counter-Claimant,

24 v.

25 HASELECT-MEDICAL RECEIVABLES
26 LITIGATION FINANCE FUND
INTERNATIONAL SP,

27 Counter-Defendant.
28

Case No. 21-14486-abl
Chapter 7

Adversary Case No. 21-01167-abl

**PLAINTIFF'S EX PARTE MOTION
TO EXCEED PAGE LIMIT
PURSUANT TO LR 9014(E) RE:
PLAINTIFF HASELECT-MEDICAL
RECEIVABLES LITIGATION
FINANCE FUND INTERNATIONAL
SP'S OPPOSITION TO TECUMSEH-
INFINITY MEDICAL RECEIVABLE
FUND, LP'S MOTION FOR
PARTIAL SUMMARY JUDGMENT
AS TO CERTAIN DISPUTED
RECEIVABLES**

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Counter-Claimant,

v.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Counter-Defendant.

Plaintiff HASElect-Medical Receivables Litigation Finance Fund International SP (“Plaintiff” or “HASElect”), by and through its undersigned counsel of record, hereby submits this Ex Parte Application for an extension of the applicable page limit for its Opposition (the “Opposition”) to Tecumseh-Infinity Medical Receivables Fund, LP’s (“Tecumseh”) *Motion for Partial Summary Judgment as to Direct Purchase Receivables* [ECF No. 90] (the “Motion”) to be filed on September 30, 2022.

Good cause exists to extend the page limit for HASElect’s Opposition. As the Court is well aware, this is a complex matter that involves multiple claims arising out of the convoluted and almost certainly fraudulent business affairs of Debtor Infinity Capital Management, Inc. (“Infinity”). HASElect and Tecumseh, which was formed in 2020 by former two employees of Griffin Asset Management LLC (“GAM”), which serves as asset manager to HASElect, have asserted competing claims to over 8,000 accounts receivable with a face value in excess of \$25 million that Infinity purchased or funded through transactions with over 100 different medical providers with whom Infinity entered into separate written contracts the terms of which vary widely and for which hundreds of thousands, if not millions, of documents, emails, and other records were created.

Moreover, the equitable relief sought by Tecumseh through the Motion raises serious concerns regarding Tecumseh’s own conduct in its dealings with Infinity as well as the conduct of Tecumseh’s principals in their dealings relating to GAM and HASElect that must be addressed in the Opposition. Similarly, Infinity’s haphazard practices in handling funds received through loans from HASElect as well as collections on accounts receivable that served as collateral for HASElect’s

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1 loans to Infinity raise additional issues that must be addressed to refute Tecumseh's claims that it
2 actually purchased the accounts receivable at issue, not Infinity.

3 Given the complex claims and extensive evidence at issue, the 20-page limit under Local
4 Rule 9014(e)(1) is insufficient in this instance to adequately address the issues raised in Tecumseh's
5 Motion. Accordingly, HASelect requests leave to file its Opposition with no more than 35 pages of
6 legal and factual analysis and argumenst, excluding the case caption and certification of mailing.

7 Based on the foregoing, HASelect respectfully requests that the Court enter an order in
8 substantially the same form as the proposed order attached hereto as Exhibit 1 granting HASelect
9 leave, pursuant to Local Rule 9014(e)(1), to file the Opposition with no more than 35 pages of legal
10 and factual analysis and argument.

11 Dated this 30th day of September 2022.

SHEA LARSEN

/s/ Bart K. Larsen, Esq.

BART K. LARSEN, ESQ.

Nevada Bar No. 8538

KYLE M. WYANT, ESQ.

Nevada Bar No. 14652

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Litigation Finance Fund International SP*

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CERTIFICATE OF SERVICE

1
2 1. On September 30, 2022, I served the following document(s): **PLAINTIFF'S EX**
3 **PARTE MOTION TO EXCEED PAGE LIMIT PURSUANT TO LR 9014(E)**
4 **RE: PLAINTIFF HASELECT-MEDICAL RECEIVABLES LITIGATION**
5 **FINANCE FUND INTERNATIONAL SP'S OPPOSITION TO TECUMSEH-**
6 **INFINITY MEDICAL RECEIVABLE FUND, LP'S MOTION FOR PARTIAL**
7 **SUMMARY JUDGMENT AS TO CERTAIN DISPUTED RECEIVABLES.**

8 2. I served the above document(s) by the following means to the persons as listed below:

9 ☒ a. ECF System:

10 CLARISSE L. CRISOSTOMO on behalf of ROBERT E. ATKINSON
11 clarisse@nv-lawfirm.com, bknotices@nv-lawfirm.com

12 GERALD M GORDON on behalf of TECUMSEH-INFINITY MEDICAL
13 RECEIVABLES FUND, LP
14 ggordon@gtg.legal, bknotices@gtg.legal

15 GABRIELLE A. HAMM on behalf of TECUMSEH-INFINITY MEDICAL
16 RECEIVABLES FUND, LP
17 gamm@Gtg.legal, bknotices@gtg.legal

18 MICHAEL D. NAPOLI on behalf of TECUMSEH-INFINITY MEDICAL
19 RECEIVABLES FUND, LP
20 michael.napoli@akerman.com,
21 cindy.ferguson@akerman.com; catherine.kretzschmar@akerman.com; laura.taveras@akerman.com;
22 masterdocketlit@akerman.com; teresa.barrera@akerman.com

23 ARIEL E. STERN on behalf of TECUMSEH-INFINITY MEDICAL
24 RECEIVABLES FUND, LP
25 ariel.stern@akerman.com, akermanlas@akerman.com

26 ☐ b. United States mail, postage fully prepaid:

27 ☐ c. Personal Service:

28 I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

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☐ For a party, delivery was made by handling the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System):
Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ f. By messenger:

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 30, 2022.

By: /s/ Bart K. Larsen, Esq.

EXHIBIT 1

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*Attorneys for HASElect-Medical Receivables
Litigation Finance Fund International SP*

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

INFINITY CAPITAL MANAGEMENT, INC.

Debtor.

HASELECT-MEDICAL RECEIVABLES
LITIGATION FINANCE FUND
INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH-INFINITY MEDICAL
RECEIVABLES FUND, LP,

Defendant.

Case No. 21-14486-abl
Chapter 7

Adversary Case No. 21-01167-abl

**ORDER GRANTING PLAINTIFF'S
EX PARTE MOTION TO EXCEED
PAGE LIMIT PURSUANT TO LR
9014(E) RE: OPPOSITION TO
TECUMSEH-INFINITY MEDICAL
RECEIVABLE FUND, LP'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT AS TO
DIRECT PURCHASE
RECEIVABLES**

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2 RECEIVABLES FUND, LP,

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5 HASELECT-MEDICAL RECEIVABLES
6 LITIGATION FINANCE FUND
7 INTERNATIONAL SP,

8 Counter-Defendant.

9 HASELECT-MEDICAL RECEIVABLES
10 LITIGATION FINANCE FUND
11 INTERNATIONAL SP,

12 Counter-Claimant,

13 v.

14 TECUMSEH-INFINITY MEDICAL
15 RECEIVABLES FUND, LP,

16 Counter-Defendant.

17 The Court, having reviewed and considered Plaintiff HASElect-Medical Receivables
18 Litigation Finance Fund International SP (“Plaintiff” or “HASElect”) *Ex Parte Motion to Exceed*
19 *Page Limit Pursuant to LR 9014(e) Re: Opposition to Motion for Partial Summary Judgment as to*
20 *Direct Purchase Receivables* (the “Ex Parte Motion”), and good cause appearing therefore:

21 IT IS HEREBY ORDERED that the Ex Parte Motion is GRANTED, and HASElect may file
22 its Opposition in excess of the page limits in LR 9014(e) to include a maximum of up to thirty-five
23 (35) pages of factual and legal analysis and arguments.

24 IT SO ORDERED.
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26
27
28

Prepared and Submitted By:

SHEA LARSEN

/s/ Bart K. Larsen

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